

2

WALTER WILHELM LAW GROUP
A Professional Corporation
Riley C. Walter #91839
Matthew P. Bunting #306034
Danielle J. Bethel #315945
205 East River Park Circle, Ste. 410
Fresno, CA 93720
Telephone: (559) 435-9800
Facsimile: (559) 435-9868
E-mail: rileywalter@w2lg.com

Chapter 9 Counsel

MCCORMICK BARSTOW, LLP
Timothy L. Thompson #133537
Mandy L. Jeffcoach #232313
Niki E. Cunningham #277976
7647 N. Fresno Street
Fresno, CA 93720
Telephone: (559) 433-1300
Facsimile: (559) 433-2300
E-mail: mandy.jeffcoach@mccormickbarstow.com

District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-1

Chapter 9

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

DECLARATION IN SUPPORT OF APPLICATION FOR ORDER SHORTENING TIME

I, Riley C. Walter, hereby declare and represent as follows:

1. I am counsel for the Debtor and maintain an office at 205 East River Park Circle, Suite 410, Fresno, California 93720.

1 2. The Debtor seeks to have the Court approve the Motion/Application
2 attached hereto as Exhibit A on shortened notice.

3 3. The Debtor seeks authority to notice the hearing for October 12, 2017, at
4 10:30 a.m. and proposes to give e-mail or first class mail notice be given by October 10,
5 2017, to Healthcare Conglomerate Associates, LLC, the California Department of Public
6 Health, all known creditors, the Debtor, and the U.S. Trustee's Office.

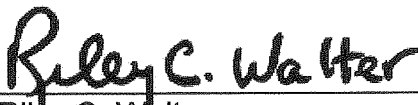
7 4. The interest of the Debtor and the Creditors will be served by shortening
8 time because the counter party to the subject executory contract has threatened to
9 terminate or suspend all employees of the hospital which will imperil health and safety
10 of patients and result in a cessation of hospital operations.

11 5. The emergency hearing is necessary for the Debtor to regain control over
12 its hospital, healthcare facilities and finances.

13 6. The Debtor needs relief as soon as possible and a hearing on very
14 shortened time is needed.

15 I declare under penalty of perjury that the foregoing facts are true and correct
16 under the laws of the United States.

17 Executed this 10th day of October, 2017, at Fresno, California.

18
19
20
21 
22 _____
23 Riley C. Walter